

HEATHER E. WILLIAMS, SBN 122664
Federal Defender
HOOTAN BAIGMOHAMMADI, SBN 279105
Assistant Federal Defender
Designated Counsel for Service
801 I Street, Third Floor
Sacramento, CA 95814
T: (916) 498-5700
F: (916) 498-5710

Attorneys for Defendant
Mr. Wilson

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-cr-00155-JAM-1
Plaintiff,)
vs.) FIRST STIPULATION AND ORDER TO
) CONTINUE SENTENCING HEARING AND
JOSHUA WILSON,) MODIFY PRESENTENCE SCHEDULE
Defendants.)
) Date: September 9, 2025
) Time: 9:00 a.m.
) Judge: Hon. John A. Mendez

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Eric Grant, through Assistant United States Attorneys James Conolly, counsel for Plaintiff; and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joshua Wilson that the Judgment and Sentencing currently set for September 9, 2025 at 9:00 be continued to October 21, 2025 at 9:00 a.m.

The parties specifically stipulate as follows:

1. Mr. Wilson moves to continue the sentencing for compelling reasons. He needs additional time to gather sentencing mitigation materials and establish a factual basis that is relevant to a possible objection to the PSR. This is Mr. Wilson's first request to continue sentencing.
2. Neither the government nor U.S. Probation object to the following modified sentencing schedule:

1	Draft PSR	completed
2	Informal Objections	September 23, 2025
3	Final PSR	September 30, 2025
4	Formal Objections	October 7, 2025
5	Response to Formal Objections	October 14, 2025
6	Judgment and Sentencing	October 21, 2025

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Wilson

Date: August 19, 2025

ERIC GRANT
United States Attorney

/s/ James Conolly
JAMES CONOLLY
Assistant United States Attorney
Attorneys for Plaintiff

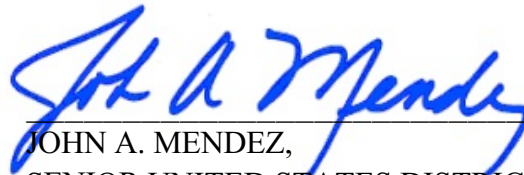
Date: August 19, 2025

ORDER

Based on the stipulation of the parties, the September 09, 2025 sentencing hearing as to JOSHUA WILSON is **CONTINUED** to **Tuesday, October 21, 2025, at 09:00 a.m.**, before Senior District Judge John A. Mendez. The PSR schedule is **ADOPTED**.

IT IS SO ORDERED.

August 19, 2025



JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE